

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JOHN R. HARRISON, Administrator)
of the Estate of Jesus Malave Morales,)

Plaintiff,)

v.)

CITY OF CLEVELAND, *et al.*,)

Defendants.)

CASE NO. 1:19-CV-02328)

JUDGE CHRISTOPHER A. BOYKO)

MAGISTRATE JUDGE WILLIAM H.)
BAUGHMAN)

Defendants Elizabeth Hester, Joseph
Stottner, Charles L. Stephens, Jr., and
Alan Furtado's Unopposed Motion for
an Extension of Time to Answer or
Otherwise Respond to Plaintiff's
Complaint

Now come Defendants Elizabeth Hester, Joseph Stottner, Charles L. Stephens, Jr., and Alan Furtado, by and through undersigned counsel, and, pursuant to Fed. R. Civ. P. 6(b), respectfully request thirty (30) days, up to and including April 15, 2020, within which to answer or otherwise respond to Plaintiff's Complaint. Counsel for Plaintiff has expressed this Motion in unopposed.

On February 23, 2020, Defendant Elizabeth Hester received service of summons. On February 24, 2020, Joseph Stottner received service of summons. On March, 4, 2020, Defendants Charles Stephens and Alan Furtado received service of summons.

On March 13, 2020, via telephone conversation, counsel for Plaintiff expressed that this Motion is unopposed.

Defendants respectfully submit that they need thirty (30) days, until April 15, 2020, in order to answer or otherwise respond to the allegations contained in Plaintiff's Complaint. No prior

request for an extension of time to answer or otherwise respond to Plaintiffs' Complaint has been sought in this case, and this request is not submitted for the purpose of delay.

For the foregoing reasons, Defendants Elizabeth Hester, Joseph Stottner, Charles L. Stephens, Jr., and Alan Furtado respectfully request that this Honorable Court grant an extension of time of thirty (30) days, up to and including April 15, 2020, within which to answer or otherwise respond to Plaintiffs' Complaint.

Respectfully submitted,

BARBARA A. LANGHENRY (0038838)
Director of Law

By: s/ Leslie J. Shafer
LESLIE J. SHAFER (0091129)
L. STEWART HASTINGS (0025852)
Assistant Directors of Law
City of Cleveland, Department of Law
601 Lakeside Avenue, Room 106
Cleveland, Ohio 44114
Tel: (216) 664-2689 Fax: (216) 664-2663
E-mail: lshafer@city.cleveland.oh.us
lshastings@city.cleveland.oh.us

Attorneys for Defendants
Elizabeth Hester, Joseph Stottner,
Charles L. Stephens, Jr., and Alan Furtado

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on March 16, 2020. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Leslie J. Shafer
Leslie J. Shafer (0091129)